

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

CEC ENTERTAINMENT, INC.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 3:16-CV-02493-M
	§	
TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA,	§	
	§	
Defendant.	§	

**DEFENDANT TRAVELERS CASUALTY AND SURETY COMPANY OF
AMERICA’S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56 and the Local Rules of this Court, Defendant Travelers Casualty and Surety Company of America (“Travelers”) files this Motion for Summary Judgment and respectfully shows the Court as follows:

Pursuant to Northern District Local Rule 56.3, Travelers’ Brief in Support of Motion for Summary Judgment filed contemporaneously with this Motion sets forth the claims and defenses for which summary judgment is sought, including citations to Travelers’ Appendix to Motion for Summary Judgment. Both Travelers’ Brief and Appendix are incorporated herein by reference.

For the reasons set forth above and in the accompanying Brief, Travelers respectfully requests that the Court enter an order granting summary judgment in Travelers’ favor as a matter of law on all of the claims asserted against it in this action, and awarding Travelers all other relief, both at law and in equity, to which it may be justly entitled.

Respectfully submitted,

By: /s/ J. Price Collins
J. Price Collins
State Bar No.: 04610700
price.collins@wilsonelser.com
Ashley F. Gilmore
State Bar No.: 50511704
ashley.gilmore@wilsonelser.com
WILSON ELSER MOSKOWITZ
EDELMAN & DICKER LLP
901 Main Street, Suite 4800
Dallas, TX 75202-3758
Telephone: 214-698-8000
Facsimile: 214-698-1101

**ATTORNEYS FOR DEFENDANT
TRAVELERS CASUALTY AND
SURETY COMPANY OF AMERICA**

CERTIFICATE OF SERVICE

This is to certify that, on February 21, 2018, a true and correct copy of the foregoing was served on the following counsel via the Court's CM/ECF system:

Amy Elizabeth Stewart
Katherine Hendler Fayne
AMY STEWART P.C.
5307 E. Mockingbird Lane, Suite 425
Dallas, TX 75206

**ATTORNEYS FOR PLAINTIFF
CEC ENTERTAINMENT, INC.**

/s/ J. Price Collins
J. Price Collins